

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

ADJUSTACAM LLC

v.

AMAZON.COM, INC.; ET AL.

NO. 6:10-cv-329-LED

JURY

PLAINTIFF'S DISCLOSURE PURSUANT TO P.R. 4-2

Pursuant to Patent L.R. 4-2 and the Court's Scheduling Order, Plaintiff, Adjustacam LLC (“AdjustaCam”), hereby states as follows:

AdjustaCam hereby provides, in the chart below, its preliminary proposed constructions for each term, phrase or clause that the Defendants have identified for claim construction purposes:

Hinge Member (Claims 1,8, and 19)	A structural element that joins to another for rotation in at least one axis of rotation.
Axis of Rotation (Claims 1 and 19)	Plain meaning.
Support Frame (Claims 1, 8 and 19)	A structural element that supports another structure.
Rotatably attached (Claims 1 and 19)	Connected such that the connected object is capable of being adjustably rotated.
Adapted to be rotatably attached (Claims 1 and 19) / Adapted to rotatably attach (Claim 8)	Formed in a manner to be connected such that the connected object is capable of being adjustably rotated.
Disposition (Claim 1)	Configuration.
Maintained adjacent said edge (Claim 1)	Plain and ordinary meaning. Alternatively, positioned near said edge.
When said first surface and said second surface are inclined from a	Plain and ordinary meaning. Alternatively, when the object is raised from a generally horizontal

generally horizontal orientation (Claim 1)	orientation.
A display screen which can be inclined from a generally horizontal position (Claim 19)	Plain and ordinary meaning. Alternatively, a display screen which can be raised from a generally horizontal position.
Body (Claim 8)	A structural element.
Proximal...end (Claim 8)	Plain and ordinary meaning.
Distal end (Claim 8)	Plain and ordinary meaning.
Hingedly attaching (Claim 8)	Connecting such that the connected object is capable of being adjustably rotated in one axis.
Pivot element (Claim 8)	An element about which something rotates.
Rotation of said support frame being prevented along an axis substantially parallel to said second axis (Claim 19)	Rotation of the support frame is prevented along an axis substantially parallel to the edge of an object.
Engagingly support (Claim 19)	Maintained in a stable position while touching.

Unless otherwise noted, the constructions advanced for a term or phrase are intended to apply wherever that term or phrase is used in the asserted claims.

Additionally, in accordance with P.R. 4-2(b), served herewith is AdjustaCam's preliminary identification of extrinsic evidence, including dictionary definitions and citations to learned treatises. In addition, AdjustaCam reserves the right to rely upon similar definitions from different sources and/or upon any of the Defendants' cited materials that AdjustaCam deems it appropriate to rely upon.

The constructions and extrinsic evidence set out above are preliminary in nature. Accordingly, AdjustaCam reserves the right to revise, supplement and/or amend the proposed constructions and/or the identified extrinsic evidence.

October 28, 2011

Respectfully submitted,

By: /s/ John J. Edmonds

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CERTIFICATE OF SERVICE

I hereby certify that all known counsel of record are being served with a copy of this document on this date via email via the defense email distribution list.

October 28, 2011

/s/ John J. Edmonds

John J. Edmonds